

EXHIBIT 2

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3 ROUGH DRAFT FORM, PLEASE BE AWARE THAT THERE MAY BE
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5 COMPARING THE REALTIME SCREEN, THE ROUGH DRAFT,
6 ROUGH ASCII, AND THE FINAL TRANSCRIPT. ALSO PLEASE
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13 AND THE LIMITATIONS IMPOSED BY WRITING IT
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15 FINAL CERTIFIED TRANSCRIPT.

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19 TO ASSURE COMPLETE ACCURACY ON THE FINAL TRANSCRIPT.

20 PLEASE NOTE IN THE CODE OF CIVIL PROCEDURE
21 2025 (R)(2): "WHEN PREPARED AS A ROUGH DRAFT
22 TRANSCRIPT, THE TRANSCRIPT OF THE DEPOSITION MAY NOT
23 BE CERTIFIED AND MAY NOT BE USED, CITED, OR
24 TRANSCRIBED AS THE CERTIFIED TRANSCRIPT OF THE
25 DEPOSITION PROCEEDINGS. THE ROUGH DRAFT TRANSCRIPT

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15 MR. CHERNY: Thank you, Mr. Ron. 18:33:08

16 THE WITNESS: Thank you very much.

17 MR. SCHUMAN: I have a few questions. You can

18 put the monitor -- can we switch, so he's not

19 looking --

20 MR. CHERNY: Sure. Sure. Do I need to clean 18:33:19

21 up over here? I'm happy to.

22 MR. SCHUMAN: No. No.

23 THE REPORTER: Can we go off the record?

24 Otherwise I have to write everything you say.

25 MR. SCHUMAN: Let's stay on the record. 18:33:28

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1 THE REPORTER: Okay. 18:33:28

2 EXAMINATION {

3 BY MR. SCHUMAN:

4 Q. Good evening, Mr. Ron.

5 A. Good evening. 18:33:55

6 Q. We met before. Obviously, I represent

7 Otto Trucking LLC.

8 What is Otto Trucking LLC?

9 A. Otto Trucking LLC is an entity that was

10 formed to hold the interest of the Otto Trucking 18:34:15

11 shareholders or members in a potential trucking or

12 logistics business at Uber.

13 Q. When was Otto Trucking LLC formed, if you

14 remember?

15 A. I believe it was formed in early 2016, in 18:34:34

16 maybe around February 2016, if I'm not mistaken.

17 Q. Okay. And what was the business

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18 activities, if any, of Otto Trucking LLC around the
19 time that it was formed?

20 A. Otto Trucking didn't have much business 18: 34: 59
21 activities, if any. It was really a legal holding
22 entity that didn't engage in any R&D activities
23 whatsoever.

24 Q. Just to follow up on that last answer, did
25 Otto Trucking, around the time that it was formed, 18: 35: 15

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1 do any work involve Li DAR development? 18: 35: 16

2 MR. CHERNY: Objection; Leading.

3 THE WITNESS: No. As I said, Otto Trucking did
4 not have any R&D activities whatsoever. It didn't
5 have any employees. And as such, it also didn't 18: 35: 29
6 engage in any Li DAR development whatsoever.

7 BY MR. SCHUMAN:

8 Q. Now, at some point, did Otto Trucking LLC
9 create an LLC agreement?

10 MR. CHERNY: Objection; Leading. 18: 35: 45

11 THE WITNESS: I believe so, yes.

12 BY MR. SCHUMAN:

13 Q. Do you remember when that was, when the
14 agreement was executed?

15 A. I don't remember the exact date, but it 18: 35: 58
16 was also in early 2016.

17 Q. I'm going to show you a document that's
18 previously been marked so we don't need to mark it
19 again. I can't make out the name of which

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20 deposition it was marked at, but it says 18: 36: 13
21 Exhibit 475.
22 (Defendants' Exhibit 475 was previously
23 marked.)
24 BY MR. SCHUMAN:
25 Q. Do you recognize Exhibit 475, Mr. Ron? 18: 36: 17

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1 (Witness reviews document.) 18: 36: 45
2 A. Yes.
3 Q. What is Exhibit 475?
4 A. It is basically the LLC, or the limited
5 liability company, agreement of Otto Trucking. 18: 36: 58
6 Q. Does anything in this document refresh
7 your recollection regarding the exact date that the
8 Otto Trucking LLC agreement was executed?
9 A. Yes. As I said before, this was in early
10 2016. And the agreement here refreshed my memory. 18: 37: 12
11 It was on April 6th, 2016.
12 Q. So between the time that Otto Trucking was
13 formed, you testified earlier February 2016, and the
14 date of this agreement, April 6th, 2016, what was
15 the business of Otto Trucking, if any? 18: 37: 31
16 MR. CHERNY: Objection; Leading.
17 THE WITNESS: It was basically a legal holding
18 company that we've formed for potentially engaging
19 in trucking business activity in the future. But
20 Otto Trucking LLC did not have any R&D activities or 18: 37: 50
21 any employees at the time.
22 BY MR. SCHUMAN:

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23 Q. So during the same time period that I just
24 asked about in my prior question, did Otto Trucking
25 do any work on developing any Li DAR systems? 18: 38: 01

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1 MR. CHERNY: Objection; Leading. 18: 38: 03

2 THE WITNESS: No, I don't believe so. As I
3 said before, Otto Trucking didn't have any
4 employees, didn't engage in any R&D activities and,
5 as pertains to both, didn't have any Li DAR activity 18: 38: 14
6 whatsoever.

7 BY MR. SCHUMAN:

8 Q. What titles did you hold during this time
9 period with Otto Trucking LLC?

10 A. I believe I was the president and the 18: 38: 27
11 general manager.

12 Q. Were you also the chief executive officer?

13 MR. CHERNY: Leading.

14 THE WITNESS: Correct.

15 BY MR. SCHUMAN: 18: 38: 36

16 Q. And what is Otto Transport LLC?

17 A. I think Otto Transport LLC was an entity
18 we formed to hold some of the self-driving trucks,
19 so the trucks that Otto Trucking had or that Otto
20 Trucking leased. 18: 39: 04

21 Q. Do you know when Otto Transport LLC was
22 formed?

23 A. I believe around August 2016.

24 Q. Going to show you a document that I don't

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25 believe has been marked before. So -- 18: 39: 22

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1 MR. SCHUMAN: Are you marking it or am I 18: 39: 26
2 supposed to mark it?

3 THE REPORTER: I'll mark it.

4 MR. SCHUMAN: Does anybody know what number
5 we're up to? For convenience, we're just going to 18: 39: 46
6 call it 10000. My apologies.

7 (Defendants' Exhibit 10,000 was marked.)

8 BY MR. SCHUMAN:

9 Q. Mr. Ron, do you recognize Exhibit 10,000?

10 A. Yes, I do. 18: 40: 19

11 Q. What is it?

12 A. I believe that's the formation document or
13 the agreement for the limited liability company
14 called Otto Transport.

15 Q. What was the relationship, if any, between 18: 40: 39
16 Otto Transport LLC and Otto Trucking LLC?

17 A. I believe that Otto Transport was owned by
18 Otto Trucking LLC.

19 Q. Did Otto Transport LLC do any research and
20 development activity? 18: 41: 12

21 A. No. Otto Transport did not have any R&D
22 activities or any research activities and
23 specifically did not engage in any LiDAR development
24 whatsoever.

25 Q. You said Otto Transport's business was to 18: 41: 31

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1 own some trucks. 18: 41: 33
2 Do you know how many trucks?
3 MR. CHERNY: Objection; foundation.
4 THE WITNESS: I think it owned around four
5 trucks, more or less. I don't know if that was 18: 41: 49
6 exact number, but I believe around that number.
7 BY MR. SCHUMAN:
8 Q. And what did Otto Transport do with those
9 trucks?
10 MR. CHERNY: Objection; vague. 18: 42: 04
11 THE WITNESS: Actually don't know how many of
12 those were actually active. But those were all
13 trucks that were developed by Uber or Ottomotto, and
14 then Otto Transport potentially operated from time
15 to time. 18: 42: 24
16 BY MR. SCHUMAN:
17 Q. Did any of those trucks have any Li DAR
18 systems used in connection with them?
19 MR. CHERNY: Objection; form.
20 THE WITNESS: I don't know for sure if there 18: 42: 49
21 was any Li DAR system. I know early on there was
22 none. And specifically what I do know is that those
23 trucks never had any developed Li DAR system. If it
24 had any Li DAR system, it was off-the-shelf Li DAR
25 components from commercial companies. 18: 43: 09

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1 BY MR. SCHUMAN: 18: 43: 15

2 Q. Just to follow up on that last answer, did

3 any of the Otto Transport-owned trucks -- were any

4 of them ever outfitted with Uber's Spider Li DAR

5 system? 18: 43: 29

6 A. No. None of the Otto Transport trucks

7 were ever outfitted with any Li DAR technology

8 developed by either Otto or Uber specifically. No,

9 they were not outfitted with any Spider technology.

10 Q. How about Fuji? Were any of the Otto 18: 43: 41

11 Transport trucks outfitted at any point with Fuji --

12 the Fuji Li DAR system?

13 A. No. None of the Otto Transport trucks

14 were outfitted with any Li DAR technology.

15 Q. So between the time that Otto Trucking was 18: 44: 01

16 formed, I think you testified earlier around

17 February 2016, and the time that -- let's say,

18 August 2016, did either Otto Trucking or Otto

19 Transport do any R&D activity with respect to Li DAR

20 systems? 18: 44: 21

21 A. No. Those entities did not engage in any

22 Li DAR activities, nor did they have any employees

23 throughout those months.

24 MR. SCHUMAN: That's all I have.

25 MR. CHERNY: Do you have any questions? 18: 44: 39

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1 MR. RABIN: Read and sign. 18: 44: 40

2 MR. CHERNY: No questions for me.

3 THE VIDEOGRAPHER: This concludes today's

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4 deposition of the individual testimony of Li or Ron.

5 Total number of media used is one. Going off the 18:44:48

6 record at 6:44 p.m.

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